

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

JAMES MOORE, JR
SANDRA D MOORE

CASE NO: 24-13723

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 5/12/2025, I did cause a copy of the following documents, described below,
Hearing Notice and Application for Compensation

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/12/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

JAMES MOORE, JR
SANDRA D MOORE

CASE NO: 24-13723

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 5/12/2025, a copy of the following documents, described below,
Hearing Notice and Application for Compensation

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/12/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
05371
CASE 24-13723-SDM
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN
MON MAY 12 13-13-59 CDT 2025

ATT
PO BOX 5087
CAROL STREAM IL 60197-5087

ADVANCED RECOVERY
219 KATHERINE DRIVE
FLOWOOD MS 39232-9588

ALLY BANK
RESURGENT CAPITAL SERVICES
PO BOX 10368
GREENVILLE SC 29603-0368

AMERICAN CREDIT ACCE
961 E MAIN ST
SPARTANBURG SC 29302-2149

AMERICAN CREDIT ACCEPTANCE
961 EAST MAIN ST
SPARTANBURG SC 29302-2149

BANK PLUS
1068 HIGHLAND COLONY P
RIDGELAND MS 39157-8807

~~EXCLUDE~~
~~LOCKE D BARKLEY~~
~~6360 I55 NORTH~~
~~SUITE 140~~
~~JACKSON MS 39211-2030~~

ERC
8014 BAYBERRY RD
JACKSONVILLE FL 32256-7412

FIRST PREMIER BANK
3820 N LOUISE AVE
SIOUX FALLS SD 57107-0145

FOX COLLECTION AGENCY
454 MOSS TRAIL
GOODLETTSVILL TN 37072-2029

FOX COLLECTION CENTER
POB 528
GOODLETTSVILLE TN 37070-0528

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY
PO BOX 7346
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

MGC MORTGAGE
PO BOX 77404
TRENTON NJ 08628-6404

MERIT HEALTH
PO BOX 281441
ATLANTA GA 30384-1441

MISSISSIPPI DEPARTMENT OF REVENUE
BANKRUPTCY SECTION
POST OFFICE BOX 22808
JACKSON MS 39225-2808

DEBTOR
JAMES MOORE JR
219 PRENTISS AVE
DREW MS 38737-3356

SANDRA D MOORE
219 PRENTISS AVE
DREW MS 38737-3356

NAVY FEDERAL CREDIT UN
PO BOX 3100
MERRIFIELD VA 22119-3100

NEWREZ LLC DBA SHELLPOINT MORTGAGE
SERVICI
BRITTANY SMITH TAYLOR
4245 BALMORAL DRIVE SW SUITE 101
HUNTSVILLE AL 35801-6497

NORTH SUNFLOWER HOSPIT
840 N OAK AVE
RULEVILLE MS 38771-3227

PASI
7100 COMMERCE WAY
STE 100
BRENTWOOD TN 37027-6935

PRA RECEIVABLES MANAGEMENT LLC
POB 41067
NORFOLK VA 23541-1067

(P)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

QUANTUM3 GROUP LLC AS AGENT FOR
CONCORA CREDIT INC
PO BOX 788
KIRKLAND WA 98083-0788

~~EXCLUDE~~
~~THOMAS C ROLLINS JR~~
~~THE ROLLINS LAW FIRM PLLC~~
~~PO BOX 13767~~
~~JACKSON MS 39236-3767~~

BRITTANY SMITH TAYLOR
PADGETT LAW GROUP
4245 BALMORAL DRIVE SW
SUITE 101
HUNTSVILLE AL 35801-6497

THE BANK OF MISSOURI DBA FORTIVA
PO BOX 105555
ATLANTA GA 30348-5555

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

TOWER LOAN OF MISSISSIPPI LLC
PO BOX 320001
FLOWOOD MS 39232-0001

U S ATTORNEY
NORTHERN DISTRICT OF MISSISSIPPI
900 JEFFERSON AVENUE
OXFORD MS 38655-3608

~~EXCLUDE~~

~~U S TRUSTEE
501 EAST COURT STREET SUITE 6430
JACKSON MS 39201-5022~~

US BANK TRUST NATIONAL ASSOCIATION
CO NEWREZ LLC DBA SHELLPOINT MORTGAGE
SERVICING
PO BOX 10826
GREENVILLE SC 29603-0826

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENUE
WASHINGTON DC 20530-0001

WELLS FARGO
800 WALNUT
DES MOINES IA 50309-3891

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

In Re: James Moore, Jr. and Sandra D Moore
Debtor(s)

)
)
)
)
)

Case No.: 24-13723-SDM
Chapter: 13
Judge: Selene D. Maddox

PLEASE TAKE NOTICE that a hearing will be held at

Go to Zoom.us/join, Enter Meeting ID 160 853 64415, and Passcode 3699380, OR
call (646) 828-7666

on 6/24/25 at 10:00 AM

Responses Due: 6/9/25

to consider and act upon the following:

38 – Application for Compensation for Thomas C. Rollins Jr., Debtor's Attorney,
Fee: \$1,133.50, Expenses: \$40.04. Filed by Thomas C. Rollins Jr.. (Attachments: # 1
Exhibit A # 2 Exhibit B # 3 Exhibit C) (Rollins, Thomas)

This hearing will be conducted by VIDEO. For procedures regarding video hearings, please see the Standing Order Regarding Video Hearings Before Judge Selene D. Maddox available on the Standing Orders page of the Court's website at www.msnb.uscourts.gov.

Should any party receiving this notice respond or object to said motion such response or objection is required to be filed with the Clerk of this court and served on the Attorney for Movant on or before said response due date. If any objection or response is filed, an evidentiary hearing will be held on the above mentioned date regarding any facts not stipulated to by the parties. If no objection or response is filed, the Court may consider said motion immediately after the objection or response due date. Please note that a corporation, partnership, trust, or other business entity, other than a sole proprietorship, may appear and act in Bankruptcy Court only through a licensed attorney.

A copy of the motion is required to be served pursuant to Rules 9013 and 9014. THE MOVING PARTY'S ATTORNEY IS REQUIRED BY THE STANDING ORDER TO PERFORM NOTICING AS TO SAID MOTION, THE NOTICE OF HEARING, AND THE OBJECTION DEADLINE, ACCORDING TO THE TERMS OF SAID STANDING ORDER. Please see the Standing Order available at:
http://www.msnb.uscourts.gov/sites/msnb/files/so_notic_revised.pdf

Dated: 5/12/25

Shallanda J. Clay
Clerk, U.S. Bankruptcy Court

BY: LJB
Deputy Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: James Moore, Jr.
Sandra D. Moore, Debtors**

**Case No. 24-13723-SDM
CHAPTER 13**

**SECOND APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF NECESSARY EXPENSES
FOR THOMAS C. ROLLINS, JR.**

COMES NOW, Thomas C. Rollins, Jr., (the “Applicant”) attorney for the Debtors, and files this *Second Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Thomas C. Rollins, Jr.* and in support thereof, would respectfully show to this Honorable Court as follows, to-wit:

1. On November 22, 2024, Debtors filed a bankruptcy petition under Chapter 13 of the bankruptcy code.

FEE AGREEMENT

2. The Debtors and Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC (hereinafter “the firm”), have agreed to an hourly billing arrangement in lieu of this Court’s standard “no look” fee award. Per said agreement, attorney T.C. Rollins is billed at a rate of \$360.00 per hour while attorney Jennifer Calvillo is billed at a rate of \$360.00 per hour. Paralegals are billed at a rate of \$155.00 per hour. Legal Assistants bill at \$100.00 per hour. Said rates are reasonable and in keeping with community custom and standards for attorneys in this area.
3. Throughout its representation of the Debtors herein, Applicant has maintained itemized billing entries which are completed and maintained contemporaneously with the associated service(s) provided.

RETAINER

4. The Debtors herein did not provide a retainer.

FEES PAID TO DATE

5. The Court previously approved interim compensation in the amount of \$2,046.20 (Dk # 24).
6. The trustee has disbursed \$2,046.20 on this claim as of May 7, 2025.

ADDITIONAL FEES REQUESTED

7. The time incurred and services provided by the firm since the filing of the previous fee application have resulted in Attorney's fees in the amount of \$1,133.50 and expenses in the amount of \$40.04 for a total of \$1,173.54. A detailed accounting of which is attached hereto as Exhibit "A".
8. This is the Applicants' second request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from December 20, 2024 to May 7, 2025.

TOTAL FEES FOR SECOND APPROVAL

9. The time incurred and services provided by the firm during the pendency of this case have resulted in Attorney's fees in the amount of \$3,134.00 and expenses in the amount of \$85.74 for a total of \$3,219.74. A detailed accounting is attached hereto as Exhibit "B".

A. LODESTAR ANALYSIS

1. The prevailing hourly rate in the community under § 330

The Applicant requests fees based on the following hourly rates: \$360.00 for attorneys, \$155.00 for paralegals, and \$100.00 for legal assistants.

The hourly rates for attorneys with similar skills and experience as consumer bankruptcy attorneys can vary widely, typically ranging from \$200 to \$450 per hour. Due to the specialized nature of bankruptcy law, many attorneys are not proficient in this field. However, with 14 years of experience, approximately 4,000 bankruptcy cases filed, board certification in consumer bankruptcy law, and a strong community reputation, Thomas Rollins is well-qualified to command fees at the higher end of this range. Similarly, Jennifer Calvillo, who has 12 years of experience with the same firm, having worked on 90% of those 4,000 cases, holds board certification in consumer bankruptcy law, is highly regarded in the community, and is a partner in her firm, is equally positioned to charge at the upper end of this spectrum. The Applicants' paraprofessionals charge a blended rate of \$127.50 per hour, which is within the reasonable range for paraprofessional services.

2. Reasonable hours expended

While Chapter 11 lawyers may only be compensated for reasonable time expended that produce a material benefit to the estate, § 330(a)(B) provides that a chapter 13 debtor's attorney can be awarded reasonable compensation for representing the interests of the debtor, based on the benefit and necessity of such services to the debtor and the other factors found in § 330.

The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.

An itemization of time is attached as Exhibit "B" and an affidavit of Applicant is attached as Exhibit "C".

3. Lodestar calculation

The lodestar amount for the Applicant's attorneys is \$2,016.00, reflecting 5.8 hours at an hourly rate of \$347.59.

For the Applicant's paraprofessionals, the lodestar amount is \$1,118.00, based on 10.7 hours at a blended rate of \$104.49 per hour.

Together, the total lodestar amount is \$3,134.00 representing a combined total of 16.5 hours at a blended rate of \$189.94 per hour.

B. ADJUSTMENTS TO LODESTAR

After determining the appropriate lodestar amount, the Court must decide whether the application of the § 330 factors and the Johnson factors warrant upward or downward adjustment.

1. § 330 Factors

The following § 330 factors were already discussed when determining the lodestar amount:

- (A) The time spent on such services;
- (B) The rates charged for such services;
- (C) Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

The remaining § 330 factors are discussed **below**:

- (D) Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a case under this title;
 - a. The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.
 - b. No adjustment is warranted.

(E) Whether the services were performed within a reasonable amount of time

commensurate with the complexity, importance, and nature of the problem, issue or task addressed;

- a. The Applicant did not devote excessive time to drafting schedules, pleadings, or conducting research. A significant amount of time was spent investigating the Debtor's financial situation and gathering the necessary documents for submission to the Trustee. This work was efficiently handled by legal assistants, who billed at \$100.00 per hour.
- b. No adjustment is warranted.

(F) With respect to a professional person, whether the person is board certified or

otherwise has demonstrated skill and experience in the bankruptcy field; and

- a. Both Thomas Rollins and Jennifer Calvillo are board-certified in consumer bankruptcy law by the American Board of Certification. In Mississippi, only five bankruptcy practitioners hold this certification, with three based in the state. Of these, two are with the Applicant's firm.
- b. The Applicant's extensive experience has already been addressed in the lodestar analysis.
- c. This factor was taken into account when setting the Applicant's hourly rate, but otherwise supports an upward adjustment.

2. Johnson Factors

The following *Johnson* factors were already discussed when determining the lodestar amount:

1. The time and labor required.
2. The novelty and difficulty of the questions presented.
3. The skill required to perform the legal services properly.
4. The customary fee in the community.
5. Whether the fee is fixed or contingent.
6. The experience, reputation, and ability of the attorneys.

The remaining *Johnson* factors are discussed **below**:

7. The preclusion of other employment by the attorney due to acceptance of the case.
 - a. Not Applicable.
 - b. No adjustment is warranted.
8. Time limitations imposed by the client or circumstances.
 - a. Not Applicable
 - b. This factor weighs in favor of an upward adjustment.
 - c. OR No adjustment is warranted.
9. The amount involved and the results obtained.
 - a. This factor was already discussed in the § 330 analysis (Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a case under this title;)
 - b. No adjustment is warranted.
 - c.
10. The undesirability of the case.
 - a. While this case is no less desirable than other chapter 13 cases, when compared to the broader legal community chapter 13 cases have many elements that make them very undesirable.
 - b. **Client Non-Cooperation:** Debtors in Chapter 13 cases may have difficulty gathering the necessary financial documentation or adhering to the repayment plan, which increases the attorney's workload and the chances of case dismissal.
 - c. **Length of the Process:** Chapter 13 cases typically last 5 years, which may lead to diminished client interest and requires attorneys to remain vigilant for potential issues throughout the repayment period. Few practice areas demand such a long-term commitment, where a lawyer must predict an appropriate fee upfront. While some bankruptcy cases are confirmed and proceed smoothly, most require substantial additional work post-confirmation, including handling Motions to Dismiss or Motions for Relief.
 - d. **Risk of Dismissal:** If the debtor fails to make payments or meet other requirements of the repayment plan, the case may be dismissed, and the attorney may not be compensated for all of the work completed. Chapter 13 practitioners collect a shockingly low percentage of allowed fees in chapter 13 cases.
 - e. This factor weighs in favor of an upward adjustment.
11. The nature and length of the professional relationship with the client.
 - a. Applicant previously represented the client in Chapter 13.
 - b. No adjustment is warranted.
12. Awards in similar cases

- a. The “market rate” of \$4,000.00 is a distorted figure, as attorneys are pressured to accept it to avoid the burdensome fee application process, rather than reflecting a true market rate.
- b. Under § 330(a)(3)(F), the Court is instructed to compensate bankruptcy attorneys at a rate comparable to that of similarly skilled and experienced **non-bankruptcy attorneys**.
- c. This is only one of the twelve Johnson factors. If the Court determines that a downward adjustment is warranted, this factor should be considered alongside the other § 330 and Johnson factors which favor an upward adjustment of the lodestar.
- d. Market rates have been addressed in the lodestar analysis, and no additional adjustment is necessary.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys’ fees for the professional services rendered herein and authorizing and directing Debtors to pay said attorneys’ fees and expenses. Applicants pray for general relief.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Application for Compensation was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.



INVOICE

Invoice # 7883
Date: 05/07/2025
Due On: 06/06/2025

The Rollins Law Firm, PLLC

P.O. Box 13767
Jackson, MS 39236
United States

James Moore, Jr. and Sandra D Moore

05633-Moore James Moore, Jr. and Sandra D

Services

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	KR	12/20/2024	Drafted and reviewed invoice for attorney and expense fees	0.20	\$0.00	\$0.00
Service	KR	12/20/2024	Drafted lodestar with calculations from invoice; reviewed time entries for summary of work done on case; drafted Application for Compensation, affidavit and the Proposed Order	0.70	\$0.00	\$0.00
Service	KR	12/20/2024	Drafted email memo to TR re: reviewed 1st Application for Compensation	0.10	\$0.00	\$0.00
Service	KR	12/20/2024	Drafted email memo to VM with the affidavit to notarize for the Application for Compensation	0.10	\$0.00	\$0.00
Service	KR	12/20/2024	Review email from Attorney: Reviewed email memo from TR re: 1st Application for Compensation	0.10	\$0.00	\$0.00
Service	CO	12/23/2024	Contact Debtor (Text/Email): Reviewed text from debtor asking if we received the documents emailed by them. Reviewed several emails with photos of federal tax returns. Responded to debtor's stating they were received but not what was requested, and asked if they had filed State taxes in 2022.	0.10	\$100.00	\$10.00
Service	CO	12/30/2024	Contact Debtor (Text/Email): Called debtor and attempted to leave a voicemail but could not. Drafted text	0.10	\$0.00	\$0.00

to debtor requesting they call back.						
Service	BB	12/30/2024	Reviewed voicemail from debtor and forwarded to CO.	0.10	\$0.00	\$0.00
Service	CO	12/30/2024	Review and organize documents provided by debtor: Phone conference with debtor regarding state tax returns. Debtor stated they could not find copies of their tax returns for either year but would keep looking. Redacted social security number from 2022 and 2023 federal tax returns. Uploaded taxes, bank statements, pay advices, ID, social security cards and confirmation order per trustee requirements.	0.40	\$100.00	\$40.00
Service	CO	12/31/2024	Call Debtor: Called debtor to run through a practice zoom call.	0.30	\$100.00	\$30.00
Service	BB	12/31/2024	Contact Debtor (Text/Email): Reviewed best case for debtors Trustee for the link for their meeting of creditors. Drafted courtesy reminder text with the meeting information for their meeting of creditors zoom for their date.	0.10	\$100.00	\$10.00
Service	TR	01/02/2025	Review: 24-13723-SDM Hearing Set (Document) Video Document# 15	0.10	\$360.00	\$36.00
Service	TR	01/02/2025	Attend Meeting of Creditors	0.40	\$360.00	\$144.00
Service	KR	01/03/2025	Drafted document with the debtor's contact information; prepared for upload to the Trustee's website	0.20	\$155.00	\$31.00
Service	KR	01/06/2025	CPA - Prepare and file certificate of compliance re: payment advices sent to Trustee: Drafted and prepared the Certification of Compliance of Filing of Payment Advices with Trustee for upload to the court	0.10	\$155.00	\$15.50
Service	JAC	01/06/2025	Review: Proof of Claim 24-13723-SDM Ally Bank Document # 5	0.10	\$360.00	\$36.00
Service	JAC	01/06/2025	Review: Proof of Claim 24-13723-SDM Ally Bank Document # 4	0.10	\$360.00	\$36.00
Service	JAC	01/09/2025	Review: Proof of Claim 24-13723-SDM Internal Revenue Service Document # 6	0.20	\$360.00	\$72.00
Service	KR	01/10/2025	Call Debtor: Telephone conference	0.10	\$155.00	\$15.50

			with debtor about the IRS claim filed being higher than listed in the plan; informed him of the increased plan payment amount.			
Service	JAC	01/13/2025	Review: Proof of Claim 24-13723-SDM The Bank of Missouri dba Fortiva Document # 7	0.10	\$360.00	\$36.00
Service	JAC	01/13/2025	Review: Proof of Claim 24-13723-SDM The Bank of Missouri dba Fortiva Document # 8	0.10	\$360.00	\$36.00
Service	TR	01/14/2025	Review: 24-13723-SDM Objection to Confirmation of the Chapter 13 Plan Document# 20	0.10	\$360.00	\$36.00
Service	TR	01/14/2025	Confirmation Hearing N.D. - 1/23/2025	0.10	\$0.00	\$0.00
Service	TR	01/16/2025	Review: 24-13723-SDM Hearing Set (Document) Document# 22	0.10	\$360.00	\$36.00
Service	CO	01/21/2025	Incoming Call: Phone conference with debtor inquiring about an objection to the debtor's chapter 13 plan, filed by the debtor's mortgage company. Reviewed court notices and tasks. Informed debtor the attorney was preparing a response and we would contact them with an update.	0.10	\$100.00	\$10.00
Service	JAC	01/23/2025	Review: 24-13723-SDM Order on Application for Compensation Document# 24	0.10	\$0.00	\$0.00
Service	BM	01/30/2025	Review: Proof of Claim 24-13723-SDM Tower Loan of Mississippi, LLC Document # 9	0.10	\$155.00	\$15.50
Service	BM	01/31/2025	Review: Proof of Claim 24-13723-SDM U.S. Bank Trust National Association, Document # 10	0.10	\$0.00	\$0.00
Service	JAC	02/01/2025	Review: Proof of Claim 24-13723-SDM U.S. Bank Trust National Association, Document # 10	0.20	\$360.00	\$72.00
Service	JAC	02/01/2025	Review claims register to determine if additional claims are needed	0.20	\$360.00	\$72.00
Service	JAC	02/05/2025	Review: 24-13723-SDM Notice to Debtor of Plan Payment Change Document# 26	0.10	\$360.00	\$36.00
Service	JAC	02/05/2025	Review: 24-13723-SDM Motion to Dismiss/Withdraw Document Document# 27	0.10	\$360.00	\$36.00

Service	JAC	02/05/2025	Review: 24-13723-SDM Order on Motion to Dismiss/Withdraw Document Document# 28	0.10	\$360.00	\$36.00
Service	CO	02/06/2025	Contact Debtor (Text/Email): Reviewed Notice to Debtor of Plan Payment Change Document# 26; Drafted email to debtor with a copy of the notice.	0.10	\$100.00	\$10.00
Service	CO	02/19/2025	Incoming Call: Phone conference with debtor with questions concerning a motion to dismiss/withdraw its objections to the confirmation of plan. Informed debtor the creditor original had an issue with the plan but has since removed their objection.	0.10	\$100.00	\$10.00
Service	JAC	03/12/2025	Review: 24-13723-SDM Notice to Debtor of Plan Payment Change Document# 34	0.10	\$360.00	\$36.00
Service	JAC	03/12/2025	Review: 24-13723-SDM Order Confirming Chapter 13 Plan Document# 35	0.10	\$360.00	\$36.00
Service	CO	03/17/2025	Contact Debtor (Text/Email): Drafted email to debtor with notice of plan payment change.	0.10	\$100.00	\$10.00
Service	TR	04/30/2025	Review and revise itemizations	0.20	\$360.00	\$72.00
Service	KR	05/07/2025	Reviewed court docket for the previous order and invoice filed; reviewed Trustee's website for amount of attorney's fees paid; drafted 1st part of the Application and lodestar	0.40	\$155.00	\$62.00
Services Subtotal						\$1,133.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	12/24/2024	Mailing Expense (certificateofservice.com)	1.00	\$40.04	\$40.04
Expenses Subtotal					\$40.04

Time Keeper	Position	Quantity	Rate	Total
Jennifer Curry Calvillo	Attorney	1.5	\$360.00	\$540.00
Jennifer Curry Calvillo	Attorney	0.1	\$0.00	\$0.00

Thomas Rollins	Attorney	0.9	\$360.00	\$324.00
Thomas Rollins	Attorney	0.1	\$0.00	\$0.00
Brooke Brueland	Non-Attorney	0.1	\$100.00	\$10.00
Brooke Brueland	Non-Attorney	0.1	\$0.00	\$0.00
Breanne McDaniel	Non-Attorney	0.1	\$155.00	\$15.50
Breanne McDaniel	Non-Attorney	0.1	\$0.00	\$0.00
Clara Ortega	Non-Attorney	1.2	\$100.00	\$120.00
Clara Ortega	Non-Attorney	0.1	\$0.00	\$0.00
Kerri Rodabough	Non-Attorney	0.8	\$155.00	\$124.00
Kerri Rodabough	Non-Attorney	1.2	\$0.00	\$0.00
			Subtotal	\$1,173.54
			Total	\$1,173.54

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7369	01/19/2025	\$2,046.20	\$0.00	\$2,046.20

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7883	06/06/2025	\$1,173.54	\$0.00	\$1,173.54
			Outstanding Balance	\$3,219.74
			Total Amount Outstanding	\$3,219.74

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: James Moore, Jr.
Sandra D. Moore, Debtors**

**Case No. 24-13723-SDM
CHAPTER 13**

SECOND ACCOUNTING OF ATTORNEY'S FEES EXHIBIT B

Attorney's Fees	Expenses	Total Fees/Expenses	Docket #	Date of Order
\$2,000.50	\$45.70	\$2,046.20	24	01/23/2025
\$1,133.50	\$40.04	\$1,173.54	n/a	n/a
\$3,134.00	\$85.74	\$3,219.74		



INVOICE

Invoice # 7369
Date: 12/20/2024
Due On: 01/19/2025

The Rollins Law Firm, PLLC

P.O. Box 13767
Jackson, MS 39236
United States

James Moore, Jr. and Sandra D Moore

05633-Moore James Moore, Jr. and Sandra D

Services

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	BM	10/23/2024	Reviewed documents provided by debtor: Information packet, PERS statements, tax returns, bank statements. Provided list of documents we still need to legal assistant.	0.20	\$155.00	\$31.00
Service	KAR	10/23/2024	Incoming Call: Telephone call from debtor requesting to speak with SA; drafted email memo to SA and CO to call debtor back	0.20	\$100.00	\$20.00
Service	SA	10/23/2024	Call Debtor: Received email from CO and KAR advising client requested a phone call. I called and spoke with James who had questions about the credit counseling course and information being requested. I assisted by answering his question.	0.10	\$100.00	\$10.00
Service	BM	10/23/2024	Incoming Call: Call from debtors with questions about the pre petition credit counseling, addressed all questions.	0.20	\$155.00	\$31.00
Service	SA	10/25/2024	In-Office Conference: Assisted clients with completing their first credit counseling course.	2.00	\$100.00	\$200.00
Service	CO	10/28/2024	Reviewed account to see what paper work is missing for refile. Drafted memo to BM for clarification on needed PERS information. Drafted email memo to debtors requesting Social Security Income information, PERS payments	0.20	\$100.00	\$20.00

			and color copies of their ID and SSC.			
Service	CO	10/28/2024	Incoming Call: phone conference with debtor with questions regarding email sent requesting PERS and Social Security income amounts, and color copies of their ID cards. Clarified what was need.	0.10	\$100.00	\$10.00
Service	BM	10/30/2024	Reviewed file to determine if we have all documents needed for attorney review, information on debtors' PERS 13th check still needed. Sent memo to legal assistant.	0.20	\$155.00	\$31.00
Service	CO	11/01/2024	Call Debtor: Phone conference with debtors to request the amount for each of their 13th PERS checks. Update task notes and sent to BM.	0.10	\$100.00	\$10.00
Service	BM	11/04/2024	Review of all documents (information packet, pay stubs, tax returns, bank statements, drivers licenses, and social security cards) to ensure we have all documents for attorney to prepare case. Sent file to attorney.	0.20	\$155.00	\$31.00
Service	BM	11/05/2024	Input Case - prepare petition, research social security number on PACER, review and select debts to import from credit report, add debts in information packet not on credit report. Began preparation of Schedule A/B, SOFA, Schedule I/J, Form 122	0.50	\$155.00	\$77.50
Service	CO	11/06/2024	Contact Debtor (Text/Email): Sent an email with debtor's matrix for them to review and respond.	0.10	\$100.00	\$10.00
Service	JAC	11/07/2024	Review & revise drafted petition, schedules prepared by bm. Sent back to bm to make changes	0.30	\$360.00	\$108.00
Service	CO	11/18/2024	Review and organize documents provided by debtor: received email from debtor with PERS statements for both debtors. Converted image file to PDF and organized into client's folder.	0.20	\$100.00	\$20.00
Service	BM	11/18/2024	Made remaining changes to Schedules after receiving information from debtors	0.20	\$155.00	\$31.00
Service	CO	11/18/2024	Incoming Call: Phone conference with debtor regarding notice from the court. Reviewed court notice on best case and informed debtors it was a notice relaying that their previous case was closing.	0.10	\$100.00	\$10.00

Service	JAC	11/19/2024	Input Case - calculate plan payment prepare schedule J and AF disclosure	0.30	\$360.00	\$108.00
Service	JAC	11/22/2024	Prepare draft declaration to ext stay for signing appointment	0.20	\$360.00	\$72.00
Service	JAC	11/22/2024	Prepare Signing Docs	0.20	\$360.00	\$72.00
Service	TR	11/22/2024	Conference w/ client to review and revise petition, schedules, statements and plan - discussed clients duties under bankruptcy code	0.50	\$360.00	\$180.00
Service	CO	11/22/2024	Call Debtor: Called debtor on behalf of attorney to ask how they let their bankruptcy case get dismissed and what steps they were taking to ensure they make they complete their bankruptcy plan this time. Debtor stated they tried to help their son who was also struggling financially and that set them behind. They stated once their case was dismissed they realized how important it was to prioritize taking care of their own financial responsibilities before trying to help anyone else.	0.10	\$100.00	\$10.00
Service	JAC	11/22/2024	Prepare the petition, schedules, forms to file with the court. Download, review, & import CCC to best case. File everything with Court.	0.40	\$360.00	\$144.00
Service	KR	11/25/2024	Draft Notice, Motion & Order: Drafted Motion and Proposed Order to Extend Stay; revised dates on the Declaration to Extend Stay	0.30	\$155.00	\$46.50
Service	CO	11/25/2024	Contact Debtor (Text/Email): Drafted email with chapter 13 yellow page information. Reviewed best case for chapter 13 plan and included the specifics of their bankruptcy plan into the yellow page document. included online payment information sheet and sent to debtors.	0.20	\$100.00	\$20.00
Service	TR	11/25/2024	Review and approve motion to extend stay drafted by KR	0.10	\$360.00	\$36.00
Service	KR	11/26/2024	Received the Declaration of Mailing from Certificate of Service; prepared the Motion to Extend Stay and the Declaration for upload to the court	0.10	\$155.00	\$15.50
Service	KR	11/26/2024	Reviewed Hearing Notice for the docket number; revised the Proposed Order; prepared the Proposed Order for upload	0.10	\$155.00	\$15.50

to the court						
Service	JAC	11/27/2024	Review: Proof of Claim 24-13723-SDM American Credit Acceptance Document # 1	0.20	\$360.00	\$72.00
Service	KR	11/27/2024	Prepared the Notice and the Plan for upload to Certificate of Service	0.10	\$155.00	\$15.50
Service	BB	11/27/2024	Contact Debtor (Text/Email): Drafted text message to debtor informing them of the date and time of their meeting of creditors. Inquired as to a date and time for us to conduct a test meeting.	0.10	\$100.00	\$10.00
Service	KR	11/27/2024	Received and reviewed the Declaration of Mailing from Certificate of Service; prepared the Notice with the Declaration of Mailing attached and the Plan for upload to the court	0.10	\$155.00	\$15.50
Service	TR	11/28/2024	Review: 24-13723-SDM Meeting of Creditors Document# 6	0.20	\$360.00	\$72.00
Service	TR	11/28/2024	Review: 24-13723-SDM Hearing Set (Document) Video Document# 9	0.10	\$360.00	\$36.00
Service	KR	12/02/2024	Reviewed Plan; drafted Confirmation Order; drafted email memo to TR re: review Confirmation Order	0.10	\$155.00	\$15.50
Service	KR	12/02/2024	Review email from Attorney: Reviewed email memo from TR re: Confirmation Order; prepared the Confirmation Order for upload to clio to attach with the Trustee documents for the Meeting of Creditors	0.10	\$155.00	\$15.50
Service	CO	12/06/2024	Review and organize documents provided by debtor: Reviewed Meeting of Creditors to determine debtor's trustee; reviewed and organized documents required by trustee for meeting of creditors including bank statements, tax returns, pay advice, and copy of driver's license and Social Security card; reduced and redacted to include only the specific dates and information required by trustee.	0.60	\$100.00	\$60.00
Service	CO	12/09/2024	Call Debtor: Called debtor to remind them to make their first payment before Dec. 20th. Debtor had a question about notices from the court about hearings. Clarified to debtors that they only need to attend the meeting of creditors scheduled for 1/2/24 and scheduled a	0.10	\$100.00	\$10.00

practice zoom call 12/23 at 2 pm.						
Service	KR	12/10/2024	Review and organize documents provided by debtor: Reviewed the court docket for the schedules to verify the financial accounts and income; reviewed all bank statements, pay advices, taxes, identification and the Confirmation Order for the legal assistant to upload to the Trustee's website for the Meeting of Creditors	0.30	\$155.00	\$46.50
Service	JAC	12/12/2024	Review: Proof of Claim 24-13723-SDM Quantum3 Group LLC as agent for Document # 2	0.10	\$360.00	\$36.00
Service	JAC	12/12/2024	Review: Proof of Claim 24-13723-SDM Quantum3 Group LLC as agent for Document # 3	0.10	\$360.00	\$36.00
Service	TR	12/17/2024	Review: 24-13723-SDM Notice of Terminated Hearing due to Settlement, Default, Continuance or Dismissal Document#	0.10	\$360.00	\$36.00
Service	CO	12/18/2024	Contact Debtor (Text/Email): Drafted email and text to debtor requesting 2022 state tax returns.	0.10	\$100.00	\$10.00
Service	TR	12/19/2024	review and revise itemizations	0.30	\$360.00	\$108.00
Service	TR	12/19/2024	Review: 24-13723-SDM Order on Motion to Extend Automatic Stay Document# 12	0.10	\$360.00	\$36.00
Non-billable services						
Service	SA	10/24/2024	Sent options fee agreement to clients to e-sign; called Mr. Moore to advise.	0.20	\$100.00	\$20.00
Service	SA	10/24/2024	Incoming Call: Clients called with issues completing the credit counseling course. They requested to come into the office to complete it. Scheduled for 10/25 at 10am.	0.20	\$100.00	\$20.00
Service	SA	10/24/2024	Administrative - non-billable work: Received email notification that both clients e-signed fee agreement.	0.10	\$100.00	\$10.00
Service	KR	10/25/2024	Review and respond to email memo: Reviewed email memo from CO re: NSLDS task and credit report; reviewed previous case and best case for old credit report; drafted email memo to CO provided the credit report from previous case	0.20	\$155.00	\$31.00
Service	CO	10/29/2024	Review and respond to email memo:	0.10	\$100.00	\$10.00

			Reviewed email memo from SA about a missed call from debtor. Called debtor back and confirmed receipt of sent social security income letters and ID cards.			
Service	CO	10/29/2024	Review of all documents to ensure we have all documents for attorney to prepare case. Sent file to attorney.: Converted and uploaded ID, social security cards, Social security benefits letter and PERS benefit letters into clients folder.	0.30	\$100.00	\$30.00
Service	CO	11/07/2024	Reviewed email from debtor with emergency contacts and updated their file.	0.10	\$100.00	\$10.00
Service	CO	11/07/2024	Reviewed email from debtor with emergency contact information. Replied to inquire about debtors matrix.	0.10	\$100.00	\$10.00
Service	BM	11/12/2024	Made changes in best case per the attorney.	0.20	\$155.00	\$31.00
Service	CO	11/14/2024	Incoming Call: Phone conference with debtor regarding information requested by attorneys. Debtor stated they had not received an October statement for PERS and were willing to request one but it would take some time to arrive by mail. Since the statement amounts are the same from month to month we decided she would submit September along with the other information requested until October statement arrived.	0.10	\$100.00	\$10.00
Service	CO	11/15/2024	Review and organize documents provided by debtor: Received email from debtor with photos of their mortgage statement and PERS statements. Converted files to PDF and uploaded to debtor's folder.	0.20	\$100.00	\$20.00
Service	BB	11/19/2024	Contact Debtor (Text/Email): Drafted and emailed Ch 13 Fee Agreement (this fee agreement is to supersede the prior generic bankruptcy fee agreement previously signed by the client)	0.10	\$100.00	\$10.00
Service	BM	11/21/2024	Call Debtor: Call with debtors to provide assistance with e-signing fee agreement. Scheduled signing with attorney while we were on the phone	0.30	\$155.00	\$46.50
Service	JAC	11/21/2024	Review clio memo re: signing appointment scheduled	0.10	\$360.00	\$36.00

Service	SA	11/22/2024	Administrative - non-billable work: Scanned and emailed signing docs to JAC	0.10	\$100.00	\$10.00
Service	JAC	11/22/2024	Send Debtor(s) the case number	0.10	\$360.00	\$36.00
Service	JAC	11/22/2024	Update Contact	0.10	\$360.00	\$36.00
Service	KR	11/25/2024	Telephone conference with the Northern Bankruptcy Court re: Motion to Extend Stay; drafted email memo to TR re: Motion to Extend Stay/Declaration to Extend Stay	0.20	\$155.00	\$31.00
Service	SA	11/25/2024	Administrative - non-billable work: Changed Bucket to "Filed" in Lawmatics	0.10	\$100.00	\$10.00
Service	KR	11/26/2024	Review email from Attorney: Reviewed email memo from TR re: Motion to Extend; revised dated on Motion; prepared the Motion and the Declaration for upload to certificate of service	0.20	\$155.00	\$31.00
Service	KR	11/26/2024	Reviewed court docket for plan and the Meeting of Creditors; started drafted Notice of Plan	0.20	\$155.00	\$31.00
Service	JAC	11/27/2024	Review: 24-13723-SDM Notice of Appearance Document# 8	0.10	\$360.00	\$36.00
Services Subtotal						\$2,000.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	11/26/2024	Mailing Expense (certificateofservice.com)	1.00	\$18.92	\$18.92
Expense	11/27/2024	Mailing Expense (certificateofservice.com)	1.00	\$26.78	\$26.78
Expenses Subtotal					\$45.70

Time Keeper	Position	Quantity	Rate	Total
Jennifer Curry Calvillo	Attorney	1.8	\$360.00	\$648.00
Thomas Rollins	Attorney	1.4	\$360.00	\$504.00
Shaton Andrews	Non-Attorney	2.1	\$100.00	\$210.00
Brooke Brueland	Non-Attorney	0.1	\$100.00	\$10.00
Breanne McDaniel	Non-Attorney	1.5	\$155.00	\$232.50
Clara Ortega	Non-Attorney	1.9	\$100.00	\$190.00

Kirsten Raimey	Non-Attorney	0.2	\$100.00	\$20.00
Kerri Rodabough	Non-Attorney	1.2	\$155.00	\$186.00
Subtotal				\$2,046.20
Total				\$2,046.20

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7369	01/19/2025	\$2,046.20	\$0.00	\$2,046.20
Outstanding Balance				\$2,046.20
Total Amount Outstanding				\$2,046.20

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: James Moore, Jr.
Sandra D. Moore, Debtors**

**Case No. 24-13723-SDM
CHAPTER 13**

AFFIDAVIT

I, Thomas C. Rollins, Jr., being first duly sworn, depose and state as follows:

1. I am an attorney licensed to practice law in the State of Mississippi and am one of the attorneys representing the debtor in the Chapter 13 case referenced in the attached Application.
2. I have personal knowledge of the matters stated herein and am competent to testify to them.
3. Attached to the Application as Exhibit "A" and/or "B" is a detailed statement of fees and expenses incurred in connection with my representation of the debtor in this matter.
4. I hereby swear and affirm that the statements, fees, and expenses listed in Exhibit "A" and/or "B" are true, accurate, and represent a reasonable accounting of the work performed, as well as any costs incurred on behalf of the debtor.
5. The fees and expenses detailed in Exhibit "A" and/or "B" are in accordance with customary rates for similar services and are fair, reasonable, and necessary under the circumstances of this Chapter 13 case.

FURTHER, AFFIANT SAYETH NAUGHT.

TCR

Thomas C. Rollins, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME, this 9th day of May, 2025, by

Thomas C. Rollins, Jr.

Shaton Andrews

Notary Public

My Commission Expires _____

Exhibit "C"

